

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

BEIJING MEISHE NETWORK
TECHNOLOGY CO., LTD.,

Plaintiff,

v.

TIKTOK INC., TIKTOK PTE. LTD.,
BYTEDANCE LTD., and BYTEDANCE
INC.,

Defendants.

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NO. 6:21-cv-504-ADA-DTG

DECLARATION OF TOM BROOKS

1. My name is Tom Brooks, and I am a consultant who has been employed by R.M.B. Consulting, Inc. (“RMB”) as an hourly contractor on a number of matters since 2016. I am over eighteen years of age and qualified to make this declaration. I have personal knowledge of the matters set forth in this declaration, and if called upon as a witness, I could and would testify competently to them.

2. Since 2016, I have been employed by RMB as support personnel for Mr. Nigel Jones in a number of litigation matters. These matters include: Ericsson v Apple, Ericsson v Collision, Neo Wireless v Dell, Aire v Samsung, Avigilon v Verkada, Zebra v Honeywell, Q3 v Netgear, WiLan v Motorola, Evolved v Samsung, Clear Imaging v Samsung, Panoptis v Apple, Franhoufer v Sirius-XM, HTC v 3G Licensing, Qualcomm v Apple, Xterra v Nokia/NEC, and CCE v Apple. These matters are identified on my CV, which I prepared for this case and understand has been provided to counsel for the plaintiff in this matter. A true and correct copy of this CV is attached at Exhibit A.

3. I am employed by RMB as support personnel for Mr. Nigel Jones in this matter. I am being compensated in this matter by RMB. I do not have an agreement with Defendants or their counsel in this matter. I receive no compensation or reimbursement from Defendants or their counsel in this matter.

4. Mr. Jones directs and oversees my work in this matter, and I report directly to him. I have not been asked to, have not been retained to, and am not planning to provide expert testimony in this matter.

5. My role as support personnel for Mr. Jones employed by RMB for this litigation matter described in ¶¶ 3 and 4 of this declaration is the same role as support personnel for MR. Jones employed by RMB in each of the litigation matters identified in ¶ 2 of this declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2023



Tom Brooks